

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re:	:	Chapter 11
	:	
Stream TV Networks, Inc., et al.	:	Bankruptcy No. 23-10763 (DJB)
	:	
Debtors.	:	(Jointly Administered)¹
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**WITNESS AND EXHIBIT LIST FOR SEPTEMBER 8, 2025 HEARING ON OMNIBUS
MOTION OF WILLIAM A. HOMONY IN HIS CAPACITY AS CHAPTER 11 TRUSTEE
FOR ENTRY OF AN ORDER: (I) APPROVING A SETTLEMENT AGREEMENT
WITH REMBRANDT 3D HOLDING, LTD. PURSUANT TO FED. R. BANKR. P. 9019(a)
AND 11 U.S.C. § 105(a); (II) ENFORCING DEFENSE AND INDEMNITY
OBLIGATIONS OF SEECUBIC, INC.; AND (III) GRANTING RELATED RELIEF**

COMES NOW William A. Homony, in his capacity as Chapter 11 Trustee (the “Trustee”) of the bankruptcy estates of Stream TV Networks, Inc. (“Stream”) and Technovative Media, Inc. (“Technovative,” and collectively with Stream, the “Debtors”) and files this Witness and Exhibit List in connection with the hearing on the Trustee’s *Motion for Entry of an Order: (i) Approving the Rembrandt Settlement Agreement (the “Rembrandt Settlement Agreement” or the “Agreement”) with Rembrandt 3D Holding Ltd. (“Rembrandt” or, in conjunction with the Trustee, may be generally referred to as “Party” or collectively, as the “Parties”) pursuant to Fed. R. Bankr. P. 9019(a) and 11 U.S.C. § 105(a); (ii) Enforcing Defense and Indemnity Obligations of SeeCubic, Inc. (“SeeCubic”); and (iii) Granting Related Relief [Dkt. No. 1040] (the “Omnibus Motion”)* set for hearing on September 8, 2025 at 9:30 a.m.

¹ On April 11, 2023, the Court entered an order directing joint administration of the above-captioned cases. (D.I. 81).

TRUSTEE’S WITNESSES

The Trustee reserves the right to call the below referenced witnesses for testimony at the hearing set for the above-referenced proceeding including the following:

1. William A. Homony
2. John D. Simmons
3. Christopher A. Michaels
4. The Trustee reserves the right to call any other witness designated or identified by any other party at the hearing for purpose of examination at the hearing and/or any rebuttal witness.

TRUSTEE’S EXHIBITS

Ex. #	Description
T-1	Omnibus Motion [D.I. 1040]
T-2	NY Settlement Agreement dated May 23, 2021 [Exhibit A to Omnibus Motion, D.I. 1040-1]
T-3	Amendment to NY Settlement Agreement dated August 12, 2023 [Exhibit B to Omnibus Motion, D.I. 1040-2]
T-4	Licensing Covenant dated August 14, 2023 [Exhibit C to Omnibus Motion, D.I. 1040-3]
T-5	Trustee’s Indemnification Demand to SeeCubic, Inc. dated March 24, 2025 [Exhibit D to Omnibus Motion, D.I. 1040-4]
T-6	SeeCubic, Inc.’s Response to Trustee’s Indemnification Demand dated June 24, 2025 [Exhibit E to Omnibus Motion, D.I. 1040-5]
T-7	Rembrandt Settlement Agreement [Exhibit F to Omnibus Motion, D.I. 1040-6]
T-8	Complaint in Pennsylvania District Court Action <i>Rembrandt 3D Holding Ltd. v. William A. Homony et al.</i> , Case No. 24-cv-06706-JMY [Exhibit G to Omnibus Motion, D.I. 1040-7]
T-9	Trustee’s Reply in Support of Omnibus Motion [Exhibit A to Motion for Leave to File Reply, D.I. 1056-1]
T-10	Declaration of William A. Homony in Support of Omnibus Motion [D.I. 1054]
T-11	Declaration of John D. Simmons in Support of Omnibus Motion [D.I. 1055]
T-12	Declaration of Christopher A. Michaels in Support of Omnibus Motion [D.I. 1057]
T-13	June 3, 2025 Judgment against SeeCubic, Inc. in California Action <i>Kaushik Banerjee vs. SeeCubic, Inc. et al.</i> Case No. MSC21-02074
T-14	Adversary Complaint in <i>Visual Semiconductor, Inc. v. Rembrandt 3D Holding, LTD., et al.</i> , Adv. No. 25-00197 (DJB) [D.I. 1071]

The Trustee reserves the right to amend and/or supplement his Witness List and Exhibit List. The Trustee further reserves the right to introduce any document designated by any other party in interest and any rebuttal documents.

Respectfully submitted,

Dated: September 3, 2025

By: /s/ Steven M. Coren
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